

EXHIBIT 10

Kathrin Bishop

From: Aaron Wagner
Sent: Monday, May 5, 2025 3:35 PM
To: Huguenard, Harris; Robbie Wright; Anthony Laporte; Bernick, Mike; Ben Herbert
Cc: Alex Pierce; Nancy Martinez; Kathrin Bishop
Subject: RE: [External] Boyle deposition - Friday 4/25/25 - Needs to be passed

Harris,

As I stated several times, I never agreed to the 8th and am not available that day as I have a show cause hearing in another case in CA that day. Again, we'd like to find a mutually agreeable date to reschedule, or we will need to proceed on our own on another date.

Thanks,

Aaron Wagner



811 SW 6th Avenue
Suite 1000
Portland, OR 97204
Direct: (971) 270-1789
Mobile: (360) 481-5107
Main: (404) 400-7300
Email: awagner@kcozlaw.com

Licensed to practice law in Washington, Oregon, Maryland, Texas, Florida, Georgia, and the District of Columbia.

From: Huguenard, Harris <hhuguenard@jw.com>
Sent: Monday, May 5, 2025 12:21 PM
To: Aaron Wagner <awagner@kcozlaw.com>; Robbie Wright <rwright@kcozlaw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Bernick, Mike <mbernick@jw.com>; Ben Herbert <bherbert@millerbarondess.com>
Cc: Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>
Subject: RE: [External] Boyle deposition - Friday 4/25/25 - Needs to be passed

Aaron,

With respect to the Lamotta deposition, Ryan will be in trial in Detroit the week of May 20th, I have a MSJ hearing scheduled for the 20th and am scheduled to start an arbitration on the 22nd, and Mike Bernick will be in depositions in California that week. All that to say, the week of the 20th does not work and you have not provided any reason for why you can't depose Mr. Lamotta on the 8th (which was previously scheduled back on April 2nd). We intend to move forward with presenting Ryan on Thursday.

Thank you,

Harris J. Huguenard | Partner
1401 McKinney, Suite 1900
Houston, TX 77010
V: (713) 752-4247 | hhuguenard@jw.com

Jackson Walker LLP

From: Aaron Wagner <awagner@kcozlaw.com>
Sent: Monday, May 5, 2025 2:11 PM
To: Huguenard, Harris <hhuguenard@jw.com>; Robbie Wright <rwright@kcozlaw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Bernick, Mike <mbernick@jw.com>; Ben Herbert <bherbert@millerbarondess.com>
Cc: Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>
Subject: RE: [External] Boyle deposition - Friday 4/25/25 - Needs to be passed

Caution: **External Email.

Harris, Mike, and Ben,

Thanks for the call today. Unfortunately, we were unable to come to resolution on the hotel fees related to the cancellation of Libby Baney's deposition, despite our collective best efforts.

Also, Harris you indicated that you are not available on May 20 to defend LaMotta's deposition. I've asked you (and Anthony) to check to see if the 21st or 22nd will work. You indicated that you are moving forward Thursday, despite my stating that I am not available and that you would discuss internally whether you were available on the 21st or 22nd and get back to me. I appreciate you doing that. I'd like to avoid motions practice if we can, and I can be flexible on the 21st, 22nd or even the 23rd if any of those dates work for you guys, Mr. LaMotta and counsel for BFS. Please just let us know, but as I stated, I will not be able to participate this Thursday.

Finally, you indicated that you will not be providing any deposition dates for Mr. Boyle or Mr. Pooley at this time. If you change your mind, please let us know. We will similarly be flexible in scheduling those, if you can provide us some dates.

Thank you,
Aaron

Aaron Wagner
 KABAT CHAPMAN & OZMER LLP
811 SW 6th Avenue
Suite 1000
Portland, OR 97204
Direct: (971) 270-1789
Mobile: (360) 481-5107
Main: (404) 400-7300
Email: awagner@kcozlaw.com

Licensed to practice law in Washington, Oregon, Maryland, Texas, Florida, Georgia, and the District of Columbia.

From: Aaron Wagner
Sent: Monday, May 5, 2025 7:19 AM
To: Huguenard, Harris <hhuguenard@jw.com>; Robbie Wright <RWright@kcozlaw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Bernick, Mike <mbernick@jw.com>; Ben Herbert <bherbert@millerbarondess.com>
Cc: Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>
Subject: RE: [External] Boyle deposition - Friday 4/25/25 - Needs to be passed

We've been asking you for dates for your experts for a few weeks now. I think we will need to bring the issue of scheduling before the court given your statements below and general refusal to cooperate in discovery in any manner.

Let's plan to discuss on our Meet and Confer today, unless you would like to have a separate call for this. Just let me know.

Thanks,
Aaron

Aaron Wagner
 KABAT CHAPMAN & OZMER LLP
811 SW 6th Avenue
Suite 1000
Portland, OR 97204
Direct: (971) 270-1789
Mobile: (360) 481-5107
Main: (404) 400-7300
Email: awagner@kcozlaw.com

Licensed to practice law in Washington, Oregon, Maryland, Texas, Florida, Georgia, and the District of Columbia.

From: Huguenard, Harris <hhuguenard@jw.com>
Sent: Monday, May 5, 2025 7:16 AM
To: Aaron Wagner <awagner@kcozlaw.com>; Robbie Wright <rwright@kcozlaw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Bernick, Mike <mbernick@jw.com>; Ben Herbert <bherbert@millerbarondess.com>
Cc: Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>
Subject: RE: [External] Boyle deposition - Friday 4/25/25 - Needs to be passed

Aaron,

The deposition of Mr. Lamotta was noticed on April 2nd. It is going forward on the 8th. We will not be presenting him for another deposition. Nor will we be presenting Dr. Boyle because BFS withdrew its notice after the parties had agreed for that deposition to occur on a specific date. Neither your client, nor any other Defendant timely noticed the deposition of Mr. Pooley. We will not be presenting him for a deposition either.

Thank you,

Harris J. Huguenard | Partner
1401 McKinney, Suite 1900
Houston, TX 77010
V: (713) 752-4247 | hhuguenard@jw.com

Jackson Walker LLP

From: Aaron Wagner <awagner@kcozlaw.com>
Sent: Monday, May 5, 2025 9:02 AM
To: Huguenard, Harris <hhuguenard@jw.com>; Robbie Wright <rwright@kcozlaw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Bernick, Mike <mbernick@jw.com>; Ben Herbert <bherbert@millerbarondess.com>
Cc: Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>
Subject: RE: [External] Boyle deposition - Friday 4/25/25 - Needs to be passed

Caution: **External Email.

Harris,

I understand that BFS plans to proceed with LaMotta's deposition Thursday but unfortunately I am not available that day. I can however take his deposition on Tuesday, May 20th. If Anthony is available that day, and would like to join on behalf of BFS, that works for me. Otherwise, please let me know if that date works for you and Mr. LaMotta. Otherwise, we will need to find another day.

Thank you,
Aaron

Aaron Wagner
 KABAT CHAPMAN & OZMER LLP
811 SW 6th Avenue
Suite 1000
Portland, OR 97204
Direct: (971) 270-1789
Mobile: (360) 481-5107
Main: (404) 400-7300
Email: awagner@kcozlaw.com

Licensed to practice law in Washington, Oregon, Maryland, Texas, Florida, Georgia, and the District of Columbia.

From: Huguenard, Harris <hhuguenard@jw.com>
Sent: Wednesday, April 30, 2025 1:25 PM
To: Robbie Wright <rwright@kcozlaw.com>; Aaron Wagner <awagner@kcozlaw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Bernick, Mike <mbernick@jw.com>; Ben Herbert <bherbert@millerbarondess.com>
Cc: Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Kathrin Bishop

<kbishop@kcozlaw.com>

Subject: RE: [External] Boyle deposition - Friday 4/25/25 - Needs to be passed

Robbie,

Anthony has confirmed that he intends to move forward with Ryan Lamotta's deposition next Thursday. We intend to present him at the currently scheduled date/time.

Thank you,

Harris J. Huguenard | Partner
1401 McKinney, Suite 1900
Houston, TX 77010
V: (713) 752-4247 | hhuguenard@jw.com

Jackson Walker LLP

From: Robbie Wright <rwright@kcozlaw.com>

Sent: Friday, April 25, 2025 7:57 AM

To: Aaron Wagner <awagner@kcozlaw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Huguenard, Harris <hhuguenard@jw.com>; Bernick, Mike <mbernick@jw.com>

Cc: Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>

Subject: RE: Boyle deposition - Friday 4/25/25 - Needs to be passed

Caution: **External Email.

Harris and Mike,

Will you please provide available dates to reschedule this deposition? Please also provide dates for the other two purported experts as well.

Thanks,

Robbie Wright

KCJO KABAT CHAPMAN & OZMER LLP

171 17th Street NW, Suite 1550

Atlanta, Georgia 30363

Direct: (404) 400-7315

Main: (404) 400-7300

Email: rwright@kcozlaw.com

From: Aaron Wagner <awagner@kcozlaw.com>

Sent: Monday, April 21, 2025 9:34 AM

To: Anthony Laporte <ALaporte@hanszenlaporte.com>; Huguenard, Harris <hhuguenard@jw.com>; Bernick, Mike <mbernick@jw.com>

Cc: Robbie Wright <rwright@kcozlaw.com>; Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez

<NMartinez@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>

Subject: RE: Boyle deposition - Friday 4/25/25 - Needs to be passed

Counsel,

We concur with Anthony's statements that Friday will not go forward. As a reminder, that date was never agreed to by me and we've indicated multiple times that we would not be prepared to proceed Friday. Your production of nearly 8,000 pages of documents late Friday is also a consideration. We will look for some other times to depose your experts and will circle back with our dates of availability.

Thank you and I hope everyone had a good holiday weekend!

Aaron

Aaron Wagner



811 SW 6th Avenue

Suite 1000

Portland, OR 97204

Direct: (971) 270-1789

Mobile: (360) 481-5107

Main: (404) 400-7300

Email: awagner@kcozlaw.com

Licensed to practice law in Washington, Oregon, Maryland, Texas, Florida, Georgia, and the District of Columbia.

From: Anthony Laporte <ALaporte@hanszenlaporte.com>

Sent: Monday, April 21, 2025 5:00 AM

To: Huguenard, Harris <hhuguenard@jw.com>; Bernick, Mike <mbernick@jw.com>

Cc: Aaron Wagner <awagner@kcozlaw.com>; Robbie Wright <rwright@kcozlaw.com>; Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>

Subject: [External] Boyle deposition - Friday 4/25/25 - Needs to be passed

Counsel,

I hope everyone had an enjoyable holiday weekend. Unfortunately, I have to pass on the deposition of Mr. Boyle set for this Friday, April 25, 2025. I start one trial on Tuesday in Matagorda County and another next Monday in Grimes County. Also, obviously, there are considerable disagreements amongst counsel as to the viability of the trial setting and the current Docket Control Order. Given all this, I will pass on the deposition of Mr. Boyle set for this Friday.

I fully recognize that it may be later argued that taking the deposition has been waived or similar opposition to rescheduling him down the road, but I will live with that outcome. For better or worse, Mr. Boyle will have to wait to be examined.

Thank you. Again, Mr. Boyle will NOT be deposed by me on Friday April 25, 2025. Do not have him appear.

Best,

Anthony

Anthony L. Laporte
Hanszen Laporte
Board Certified in Civil Trial Law
ABOTA Member
14201 Memorial Drive
Houston, Texas 77079
713-522-9444
713-524-2580 facsimile
832-746-4204 cell
alaporte@hanszenlaporte.com